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**in the Future**

## **Office of the Superintendent**

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September 16, 2013

Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

In the Matter of Modernizing the E-Rate Program for Schools & Libraries  
WC Docket No. 13-184

The following comments are submitted in response to proposed changes to the E-Rate program currently under review by the Commission:

The success of the E-Rate Program in assisting schools across America in addressing the connectivity of campuses and classrooms in support of instruction ranks among the greatest accomplishments of Federal-State-Local cooperation in history. The proposed changes can only make the program better. Specific improvements should include:

- Increasing the funding cap to address the many needs which have not been served due to the current limits. Raising the annual funding cap to \$5 million would address many of the proposals which have been unfunded each year.
- Addressing identified issues of connectivity before considering expansion to new areas of service. The President's proposal to ensure broadband connectivity to 99% of the nation's students will require a significant increase in funding for this purpose.
- Local school districts function best when provided a maximum level of flexibility in designing services to meet local needs. E-Rate regulations should balance the need for federal controls over funds with local needs and the services to address them.
- A streamlined application process which allows for additional flexibility including online filing and a reduction in the number of individual forms required. Revisions to the funding cycle to provide for more timely application and funding in response to changing needs will also enhance the ability of school districts to access necessary services.

- Continue to target priority 1 funding to those school districts enrolling the largest percentage of students from poverty backgrounds. This is consistent with the federal role in addressing gaps in resources which separate the “haves” from the “have-nots.”
- Targeting funds to support expanded bandwidth is consistent with changing instructional needs experienced by all schools.
- Determining eligibility at the school district level rather than the campus level would acknowledge the need for a coordinated system-wide approach to services.

In summary, the FCC should address current needs before launching new programs; should increase flexibility for the use of E-Rate funds; and should streamline the entire process.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Benny L. Gooden". The signature is fluid and cursive, with a large initial "B" and a stylized "G".

Benny L. Gooden, Ed.D.  
Superintendent of Schools

pc: Noelle Ellerson